

**UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT**

FRED WATSON,	)	
	)	
Appellee,	)	
	)	
v.	)	Appeal No. 22-3233
	)	
EDDIE BOYD, III, et al.	)	
	)	
Appellants.	)	

**APPELLANT FRED WATSON’S STATEMENT OF ISSUES**

Appellant Fred Watson identifies the following Statement of Issues that he intends to present in this appeal:

1. Whether the district court erred in granting summary judgment to Defendant Eddie Boyd III on Count 1 of Plaintiff Fred Watson’s First Amended Complaint, which alleged that Defendant Boyd engaged in an unlawful search and seizure in violation of Mr. Watson’s Fourth Amendment rights.
2. Whether the district court erred in granting summary judgment to Defendant Eddie Boyd III on Count 2 of Plaintiff Fred Watson’s First Amended Complaint, which alleged that Defendant Boyd engaged in unlawful retaliation in violation of Mr. Watson’s First Amendment rights.
3. Whether the District Court erred in repeatedly failing to construe the facts in the light most favorable to Mr. Watson and in failing to take into account the grave credibility issues with Defendant Eddie Boyd III.

4. Whether the District Court improperly granted the City of Ferguson's Motion for Summary Judgment as to Mr. Watson's *Monell* claim in Count IV as there is a genuine dispute of material fact as to whether Mr. Watson suffered underlying constitutional violations for which the City should be liable.

Dated: November 9, 2022

Respectfully submitted,

**ARCHCITY DEFENDERS, INC.**

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